

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED <b>MAR 26 2019</b>
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	<u>SUSPENDING</u>
- v. -	:	<u>INFORMATION</u>
	:	
CIRO SAMA,	:	S1 18 Cr. 769 (KMW)
	:	
Defendant.	:	
- - - - -	X	

COUNT ONE

(Conspiracy to Commit an Offense against the United States)

The United States Attorney charges:

1. On or about August 12, 2018, in the Southern District of New York and elsewhere, CIRO SAMA, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, Hobbs Act robbery, in violation of Title 18, United States Code, Section 1951.

2. It was a part and object of the conspiracy that CIRO SAMA, the defendant, and others known and unknown, would and did knowingly commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of

articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

Overt Act

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about August 12, 2018, CIRO SAMA, the defendant, or a coconspirator, participated in an attempt to rob at gunpoint a cellular telephone store in the Bronx, New York.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION


4. As a result of committing the offense alleged in Count One of this Information, CIRO SAMA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

**SUBSTITUTE ASSETS PROVISION**

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third person;
  - c. has been placed beyond the jurisdiction of the Court;
  - d. has been substantially diminished in value; or
  - e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

v.

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Defendant.

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SUPERSEDING INFORMATION

S1 18 Cr. 769 (KMW)

(18 U.S.C. § 371.)

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GEOFFREY S. BERMAN  
United States Attorney

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